

## DfT Cycling and Walking Investment Strategy (CWIS) safety review

<https://www.gov.uk/government/consultations/cycling-and-walking-investment-strategy-cwis-safety-review>

1 June 2018

### About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 active supporters, of whom 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

LCC welcomes the opportunity to respond to the Cycling and Walking Strategy Review.

### Introduction

We note at the outset this key statement from the CWIS review introduction:

*"1.3 At a national level (England), [cycling has remained at 2% of all journeys for a number of years](#). However, in places that have consistently invested in cycling there have been significant increases in trips by bike. This is most obvious in London where [cycling stages increased by 154% in the period from 2000-2016](#)."*

We note and welcome the intentions of the Government's target to double cycling levels in England by 2025. But given the low starting position - as well as the proven efficacy of adopting measures such as Dutch-style cycle lanes and motor traffic reduction - we believe this target is not sufficiently ambitious and should be treated as a bare minimum.

As London's primary cycle campaigning organisation we have been lobbying for 40 years to secure investment in improving cycling conditions and, in recent years, we are pleased that London's previous and current Mayors have accepted our arguments that it is necessary to adopt a Dutch-style approach to facilitating cycling. Critically, this necessarily means prioritising cycling – in both time and space – over motor traffic. The link between consequent results is very evident in the contrasting performance of London, the 'Cycling Cities' and other parts of England.

The welcome progress we have seen in London would be enhanced by similar levels of investment and infrastructure provision across the UK, as well as by national legislation, procurement policies and design guidance to facilitate both the delivery of infrastructure and the reduction of road danger.

We note the DfT's pursuit of evidence to justify the investment in cycling at national and local level. This has been addressed by the report of the All Party Parliamentary Cycling Group on cycling as well as the numerous reports, business plans, strategy documents and cost benefit analyses carried out in London and elsewhere. We enclose some materials with this response (see below).

The outcomes of investment in active travel in London speak for themselves: the stream of cyclists passing Big Ben along the protected cycle track is a regular reminder that cycling works.

It is LCC's view that the case for promoting cycling – for its congestion-busting, environmental and public health benefits – has been overwhelmingly and repeatedly proven. The methodologies for doing this effectively have been demonstrated many times and are readily available to government. Repeated consultations and advisory bodies have provided government with all the essential knowledge it needs to deliver. Fundamentally, the only thing now needed for the CWIS to be successful is the political determination to act. We look forward to supporting Ministers in showing that determination.

## **Summary of key points**

Every survey of attitudes to cycling finds that fear of traffic is a primary barrier to cycle use<sup>1</sup>. Reducing motor vehicle flows, enforcing and reducing speed limits and implementing high grade cycling infrastructure has been clearly shown, in the UK and abroad, to address people's fears and to result in significantly increased cycling levels. If the government wants to meet, and exceed, its cycling target it has to be unstinting in expanding high-quality cycling infrastructure, and reducing motor traffic speeds and volumes, particularly where cyclists and motor vehicles share space.

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<sup>1</sup> <http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf> Page 54

Below we summarise the key policy and legislative measures that can further assist cycling growth in London and also boost growth elsewhere in the UK.

1. “Turning the Corner” – the case for legislation to require vehicles to give way to “straight-on” pedestrian and cycle traffic has been well made by British Cycling in its paper on Turning the Corner<sup>2</sup>.  
Enactment of legislation that would bring the UK in line with most of northern Europe would simplify cycle infrastructure design, reduce collisions and potentially improve signal timings for everyone, including drivers.
2. In the absence of the above legislation, or in addition, permission to use zebras and cycle crossings at the mouths of junctions, rather than set back a distance from the junction, would visually and legally clarify that pedestrians and cyclists crossing (including from the end of a section of cycle track) have priority over turning traffic. This arrangement is common on the continent. Signalised crossings should be included in this improvement.
3. An explicit policy of reducing car dependency in the UK, rather than a continuing investment in more motoring miles,<sup>3</sup> would enable local authorities to promote sustainable transport more effectively.  
Ultimately, if cycling or walking a journey is not safer-feeling, more comfortable and enjoyable, as well as more convenient than driving a journey, then that journey won’t generally be walked or cycled.  
Therefore as well as improving provision for cycling, reducing unnecessary car journeys must be explicitly considered too.
4. As one of the means to reduce car ownership and use, car parking provision in new urban developments should be constrained, rather than encouraged, with maximum, rather than minimum, car parking provision specified.
5. DfT guidance on cycle infrastructure design (CID 2/08 - 2008) should be updated to bring it in-line with the draft guidance for the Strategic Road Network (195/16 - 2016), Welsh guidance (Design Guidance -

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[https://www.britishcycling.org.uk/zuvvi/media/bc\\_files/campaigning/2017/Technical\\_note\\_on\\_Vissim\\_modeling.pdf](https://www.britishcycling.org.uk/zuvvi/media/bc_files/campaigning/2017/Technical_note_on_Vissim_modeling.pdf)

<sup>3</sup> “More users, more happy with more journeys, leading to road user satisfaction levels of 95%” from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/408514/ris-for-2015-16-road-period-web-version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf)

2014) and the London guidance (London Cycle Design Standards - 2014). This guidance should be given status as a standard for all roads across the UK, rather than leaving it to individual regional authorities to decide whether to reduce road danger, in line with good practice standards, for non-motorised road users in all traffic schemes.

6. Legislation should be enacted to enable London to retain Vehicle Excise Duty to improve road conditions in the capital.
7. Cycle training should be explicitly included in the school curriculum, and provided for in every school, for all pupils.
8. The review of driving offences and enforcement, promised in 2014, is long overdue and should be brought forward as a priority – with an aim to ensure far safer driving behaviour as the norm on our streets.
9. Safer Urban Driving (SUD), the government (Joint Approvals Unit for Periodic Training, JAUP) approved module of HGV Certificate of Professional Competence training, should be part of the compulsory element of driver CPC qualifications.
10. All relevant government procurement should include: 'direct vision' standards (based on TfL's developed rating approach), Fleet Operators Recognition Scheme (or equivalent) accreditation (at silver grade or above), and Construction Logistics and Community Safety (CLOCS) champion status.
11. DfT should lobby to ensure minimal delay in implementation of the new European Union regulations regarding lorries with improved direct vision.
12. The work of the London Freight Enforcement Partnership should be replicated in other parts of the UK.
13. Local authorities should be directed to lower speed limits, especially on rural roads where most cycling fatalities occur, as well as on roads where people live, work and shop.
14. 'Close passing' initiatives, similar to those run by the West Midlands police, should take place across the UK, backed by Government messaging.
15. Drivers should be made aware of the 'dooring' hazard and advised to reach for door handles with their left hand which would encourage them to look back for passing riders (Dutch reach).

16. The DfT should be taking a more liberal attitude to junction and infrastructure design trials where proposed by forward thinking local authorities.
17. Government bodies should have targets for active travel participation. We note that a large proportion of employment in many boroughs is in the state and health sectors.

It is worth noting that policies 3, 4, 9, 10, 11 and 12 are already either in place in London or form part of the Mayor of London's Transport Strategy.

### **All Party Parliamentary Cycling Group 'Get Britain Cycling' report**

LCC has previously submitted evidence to the All Party Parliamentary Cycling Group (APPCG) investigation of cycling and we commend its findings and recommendations titled 'Get Britain Cycling'<sup>4</sup>. A copy of our response is enclosed. The findings of the APPCG report should be incorporated into government approaches and legislation.

### **London Mayor's Transport Strategy**

LCC submitted a detailed response to the London Mayor's Transport Strategy<sup>5</sup> in 2017. This forward-thinking document recognises the need to reduce car use from current levels even as the population of London rises by 20%.

Underpinning the strategy is a modal switch from 62% public transport, walking and cycling trips to 80% with a corresponding reduction in car use.

We enclose a copy of our response to the London Mayor's Transport Strategy. Again, we recommend the government adopts and adapts many of the London Mayor's current principles and approaches in order to ensure the UK sees growth in cycling towards the government's own targets.

### **Cycling UK response to the CWIS review**

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<sup>4</sup> <https://allpartycycling.org/inquiry/>

<sup>5</sup> <https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy-2018>

We note and commend the comprehensive response of the UK's national cycling organisation to the CWIS review<sup>6</sup>. It is not our intention in this response to duplicate the evidence and comment provided by Cycling UK but we trust that the learning from London's successes, and failings, will support the case made by Cycling UK for increased investment in cycling and road danger reduction.

## **London progress**

As noted in the DfT introduction to the CWIS review, cycle journeys in London have increased from fewer than 300,000 per day in 2001 to 730,000 per day in 2016. This growth has taken total London cycling volumes to a level comparable to Amsterdam (whose population is much lower but where cycle trips have a 36% modal share).

Transport for London's business plan anticipates growth in cycling at current levels (circa 6% per annum) to reach 1.5 million journeys per day by 2026 and a TfL 'scenario' contained in the London Mayor's Transport Strategy evidence base models a 15% mode share (further extending current growth rates to 2041) which, according to TfL, would result in a 13% reduction in traffic congestion. This would be a significant contribution to the London Mayor's overall Transport Strategy which sets a target of 80% of journeys to be made by walking, cycling and public transport by 2041.

Both the 2026 target and the 2041 'scenario' would also make a significant contribution to the DfT's target of doubling cycle use in England by 2025 and making cycling and walking the 'norm' for shorter trips by 2040. However, the DfT and government should not be relying on London to 'make up' the numbers. Instead, the experience of London (and increasingly other urban centres such as Greater Manchester, Leicester etc. that are taking major strides to improve cycling) should be acting as a template for urban cycling, while the government should also be developing more rural cycling infrastructure and other approaches.

## **London strategies**

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<sup>6</sup> [https://www.cyclinguk.org/sites/default/files/document/2018/04/1804\\_cyclinguk\\_cycle-safety-make-it-simple.pdf](https://www.cyclinguk.org/sites/default/files/document/2018/04/1804_cyclinguk_cycle-safety-make-it-simple.pdf)

The initial spurt in cycling growth in London came with the introduction of congestion charging (CC) in 2003. An increase of 30% in cycle trips into central London occurred within a year of the introduction of the congestion charging zone (CCZ). The promotion of cycling as an alternative to the CC was not a primary part of the TfL CCZ programme and it was voluntary organisations such as the LCC that sought publicity for cycle use as an alternative to paying the CC.

LCC has consistently argued in favour of dynamic road pricing across the city which would serve to further incentivise alternatives to car use and also release road space that could then be utilised to install infrastructure that facilitates more efficient, healthy and sustainable modes of transport. We note that the initial CC was implemented without plans for reallocation of road space. Studies for TfL show more extensive road pricing has the potential to deliver significant modal shift.<sup>7</sup>

It is notable that more significant TfL investment in cycle promotion and cycle infrastructure commenced once evidence of the growth in cycling following congestion charging became available, and after advocacy groups made the case for increased investment. This learning no longer needs to be repeated.

Since 2003 there has been relatively steady growth in cycle use in London accompanied by increased investment and, in the past 6 years, a significant improvement in the quality of cycle infrastructure that is being built.

## **Design standards**

The most recent London Cycle Design Standards (2014) are the first to reflect the Dutch and Danish design principles that have proved so successful in encouraging high cycling levels in those countries.

The weaknesses in the current London standards include the hesitant recommendation of established Dutch designs such as cycle-friendly roundabouts and cycle priority streets (and we note that TfL is mindful of the DfT's cautious opinion of designs that are new to the UK) and the high threshold (in terms of motor vehicle volumes) for introducing protected cycle lanes.

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<sup>7</sup> <http://content.tfl.gov.uk/integrated-impact-assessment-appendices.pdf>

Despite the flaws in the standards, there is no question that new London cycle infrastructure such as the East–West Cycle Superhighway from Tower Gateway to Paddington, and the North-South Cycle Superhighway from Elephant and Castle to Farringdon (currently being extended towards King’s Cross) has broken new ground in the UK. These schemes have also successfully attracted thousands of riders and shown increases in ridership of up to 54% shortly after construction.

## **Regional variation**

One of the weak points of London’s cycling boom is the huge variation in attitude towards cycling and cycling schemes from local authority to local authority, and even internally within TfL. London has not just 33 boroughs, and TfL, but numerous other landowning etc. stakeholders (such as the Royal Parks) that all have individual political make-up, corporate approaches etc. to cycling.

The London Mayor’s Transport Strategy, and other funding guidance (e.g. LIP, Liveable Neighbourhoods etc.) has increasingly sought to create mechanisms that tie funding to quality of proposal and certainty of delivery. On top of this, documents and tools such as the “Healthy Streets Check” and “London Cycling Design Standards” are increasingly used to ensure coherence of design across borough boundaries and to reach minimum quality standards, plus educate officers.

A similar approach will be vital from the DfT – which must take a more ‘hands-on’ approach to cycle scheme funding, design, implementation, planning etc. – if the government wishes to hit its mode share targets across the UK, rather than looking to just a few authorities to outperform most.

## **CWIS review questions**

### **Consultation question 1**

*Do you have any suggestions on the way in which the current approach to development and maintenance of road signs and infrastructure impacts the safety of cyclists and other vulnerable road users? How could it be improved?*



See introductory comments.

English cycle infrastructure, cycle infrastructure design standards and legislation regarding vulnerable road users lag behind those European countries that have high cycling participation levels.

The impact of this failing is most evident in school trips. As the consultation text highlights, cycling to school remains very low in the UK (3% of trips to school) and this remains the case even in cities, like London, where cycling overall has increased. In Holland more than 40% of school trips are made by bicycle.

Surveys consistently show that the majority of children in British cities would like to cycle to school. This, however, is contingent on their parents and school authorities allowing them to do so, which in turn is dependent on cycling infrastructure meeting parent's expectations, and motorist behaviour following patterns established in the Netherlands. As noted above, we make the following recommendations regarding infrastructure and design.

- “Turning the Corner” – the case for legislation to require vehicles to give way to “straight-on” pedestrian and cycle traffic has been well made by British Cycling in its paper on Turning the Corner. Enactment of legislation that would bring the UK in line with most of northern Europe would simplify cycle infrastructure design, reduce collisions and potentially reduce signal timings.
- In the absence of the above legislation, or in addition, permission to use zebras and cycle crossings at the mouths of junctions, rather than set back a distance from the junction, would visually and legally clarify that pedestrians and cyclists crossing (including from the end of a section of cycle track) have priority over turning traffic. This arrangement is common on the continent. Signalised crossings should be included in this improvement.
- An explicit policy of reducing car dependency in the UK, rather than an assumption of a growth in motoring miles, would enable local authorities to promote sustainable transport more effectively.
- Car parking provision in new urban developments should be constrained, rather than encouraged, with maximum, rather than minimum, car parking provision specified .

- DfT guidance on cycle infrastructure design (CID 2/08 - 2008) should be updated to bring it in-line with the draft guidance for the Strategic Road Network (195/16 - 2016), Welsh guidance (Design Guidance - 2014) and the London guidance (London Cycle Design Standards - 2014).
- A decentralised approach to design standards, as well as to funding, allows individual councils to get away with doing nothing for cycling. This needs to be addressed (as above).
- The DfT should be taking a more liberal attitude to junction and infrastructure design trials where proposed by forward thinking local authorities. There are many local authorities and engineers in London who are concerned about the inability to innovate in junction and link layouts due to rigidity over DfT regulations. Examples we are aware of include: regulations concerning set-back space for cycles turning from a track onto a crossing; cycle and pedestrian diagonal crossings to enable a UK version of Dutch and other European “all green” or “scramble” junctions; low-level cycle-specific signals on a high-level general traffic signal pole.

## **Consultation question 2**

*Please set out any areas where you consider the laws or rules relating to road safety and their enforcement, with particular reference to cyclists and pedestrians, could be used to support the Government’s aim of improving cycling and walking safety whilst promoting more active travel.*

We note that, according to newspaper reports, the Government has already decided to propose a new offence of causing death by dangerous cycling.

Together with other cycling organisations we share the view that the entire penalty system for road incidents and offences needs to be reviewed, not just that regarding cycling offences. Judgements and sentencing in cases of road crime do not appear consistent nor effective in reducing offending. We note that the Government agreed to a review in 2014, but has yet to bring this forward, despite finding time to study “dangerous cycling” laws after one high profile case.

Regarding specific “dangerous cycling” legislation, we note that collisions and injuries arising from such behaviour remain very rare, but of course we would like them to never happen. Implementation of high-quality cycle infrastructure

(see above) can help to minimise conflicts on the roads and reduce collisions between those driving and cycling, between those cycling and walking, and between those driving and walking.

### **Highway Code**

As noted above LCC strongly supports the British Cycling Turning the Corner campaign, and had made the case to DfT for such legislation before the Turning the Corner Campaign was announced.

Legislation for straight-on priority would simplify junction design, would be highly likely to improve the safety record of most junctions; it could well reduce waiting times for all road users at most junctions too.

The safety benefits of legislation for straight-on priority would apply to cyclist/pedestrian conflicts as well as motorist/cyclist and motorist/pedestrian conflicts. We would strongly advise any minister or MP who wishes to experience the benefits of such legislation to try cycling in Holland.

### **Presumed liability**

We note that in the consultation documents the DfT raises the issue of civil liability, but without mentioning that most European countries have legislation generally called 'presumed liability' under which larger motor vehicles are held responsible for injuries to vulnerable users, unless otherwise proven, in civil and insurance terms. There is extensive literature on the topic. We quote Lord Denning (1982):

*"Any civilised system of law should require, as a matter of principle, that the person who uses this dangerous instrument on the roads - dealing death and destruction all round - should be liable to make compensation to anyone who is killed or injured in consequence of the use of it.*

*"There should be liability without proof of fault. To require an injured person to prove fault results in the gravest injustice to many innocent persons who have not the wherewithal to prove it."*

We share the view with other cycling organisations that presumed liability, in conjunction with other measures, can contribute to a reduction in road casualties. Presumed liability helps underpin pro-cycling policies in countries like the Netherlands, where even on streets where there are no protected cycle tracks cyclists feel safer knowing that motor vehicles will give way when turning across cycle lanes.

## Speed

As all drivers are expected to know, higher speeds lead to more severe collisions. Yet DfT data based on roadside measurements in 2016 found that 8 in 10 motorists exceed speed limits.<sup>8</sup>

The continued tolerance of 60 mph speed limits on narrow rural roads in the face of high collision rates is also of serious concern.

In urban conditions, such as London, average speeds are low because of congestion but burst speeds can be high and hazardous. The recently adopted London Mayor's Transport Strategy (2017) for London is explicit in seeking to reduce speed limits to 20 mph wherever suitable:

*"Introducing lower speed limits and improving compliance with speed limits through design, enforcement, technology, information and appropriate training. Twenty miles per hour limits will continue to be implemented on London's streets, with 20mph considered as part of all new schemes on the Transport for London Road Network. TfL will look to implement 20mph limits on its streets in central London as a priority, with implementation being widened across inner and outer London as soon as is practicably possible<sup>9</sup>."*

We share the view that 20 mph speed limits on streets where people live, work and shop are a common sense way of reducing road danger.

## Enforcement of ASLs

Advanced Stop Lines (ASLs), sometimes combined with early release signals for cyclists, can assist riders to clear junctions before motor vehicles. We note that on some London streets, Clerkenwell Road/Old Street for example, ASLs are entirely filled with cyclists at busy times. A vehicle entering an ASL illegally can force riders into hazardous positions.

Enforcement of ASLs, however, is rare and requires police officers to observe the traffic violation and issue penalty points and fines.

Legislation to enable local authority and camera enforcement of ASLs would likely increase compliance with this frequently-used infrastructure design.

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<sup>8</sup> <https://www.telegraph.co.uk/news/2017/07/03/drivers-ignore-20mph-speed-limits-official-figures-show/>

<sup>9</sup> <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

### **Consultation question 3**

*Do you have any suggestions for improving the way road users are trained, with specific consideration to protecting cyclists and pedestrians?*

#### **Bikeability**

This worthwhile programme, originally initiated by an LCC member, teaches confident cycling to both adults and children and must continue to be funded. LCC finds that even experienced cyclists can benefit from instruction.

In the light of the increasing problem of obesity among children the Government should consider making Bikeability part of the school curriculum – with every school teaching every child to cycle. In the Netherlands virtually all schools teach on-road cycling skills.

The problem in most of the UK is that even though most children wish to cycle they are prevented from doing so by parents, and some schools, who are concerned about road danger. The increased availability of protected cycle lanes is a well-established method of changing this understandable view. In the Netherlands, where safe routes to school are ubiquitous, almost half of trips to school are by bicycle.

We note that in areas where traffic-free cycle routes are available (for example around Victoria Park in East London) cycling to school is more common than elsewhere.

#### **Safer Urban Driving**

This outstanding, JAUPPT-approved, programme aimed primarily at lorry drivers should become a compulsory element of a lorry drivers' Certificate of Professional Competence (CPC) training.

Drivers who have completed the course, which teaches how to avoid collisions with vulnerable road users, not only rate it highly, but many say they have taken up cycling as a consequence of the course.

An important element of the programme is on-bike experience which helps drivers understand the movements and danger avoidance tactics of cycle users.

We would like to see all professional drivers, including driving instructors, take this course. We note that the AA and BSM already provide cycle awareness training for all drivers.<sup>10</sup>

### **Exchanging Places**

This programme invites cyclists and pedestrians into a conventional lorry cab to show them how poor vision is out of a lorry and how they need to adjust their risk avoidance strategy in the light of this poor visibility.

While this is a worthwhile exercise it also highlights that the largest and most dangerous vehicles on the road are also the ones designed to afford the worst vision.

### **Consultation question 4**

*Do you have any suggestions on how we can improve road user education to help support more and safer walking and cycling?*

See responses to Question 3.

### **Consultation question 5**

*Do you have any suggestions on how Government policy on vehicles and equipment could improve safety of cyclists and pedestrians, whilst continuing to promote more walking and cycling?*

### **Freight consolidation**

London already has a policy of freight consolidation and the city's Mayor has a target of reducing freight traffic in the central London morning peaks by 10% on current levels by 2026. National guidance on freight consolidation and setting up consolidation centres, and restrictions on workplace deliveries for government employees would help reduce both congestion and pollution.

### **Direct Vision**

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<sup>10</sup> <http://www.theaa.com/newsroom/news-2013/aa-driving-school-and-bsm-to-roll-out-cycle-awareness-module.html>

In London the highest proportion of cyclist fatalities (circa 50%) involve an HGV, despite the fact that HGVs account for less than 5% of vehicle miles in the capital. HGVs are also involved in 20% of pedestrian fatalities. The DfT must support TfL in advocating, through appropriate procurement policies and traffic orders, the use of lorries with good 'direct vision'.

DfT must also use its influence at European level (and we note that this issue is international in scope and not constrained by EU membership) to ensure that forthcoming EU Council and United Nations Economic Commission for Europe (UNECE) regulations specify requirements for highly-rated direct vision (as measured by the new TfL-led standard) in all new vehicle designs for urban use.

We note that TfL have developed a Direct Vision Standard and that the European Commission has backed improved direct vision designs for new HGVs, subject to approval of the European Council and ratification by the European Parliament (which initiated the measure). The Commission has said that the standard will be enforced on new lorry types 48 months after final approval of the measure, and on all new lorries 84 months after the approval. DfT should seek to ensure the shortest possible delay to final approval so that road danger can be reduced as soon as possible.

LCC has advocated improved direct vision in lorries for several years and welcomes TfL's development of a new standard. We have provided extensive comment on direct vision in response to TfL consultations<sup>11</sup>.

We note that the current Foreign Secretary, when Mayor of London, personally lobbied the EU to progress regulations on improved direct vision.

We welcome the introduction of requirements, through traffic orders and procurement and planning policies, to install safety features on HGVs such as side guards, cameras, alert systems for driver and other road users, front underrun protection, rear underrun protection and a complete set of safety mirrors.

## **FORS**

The Fleet Operators Recognition Scheme helps to ensure that HGVs used in the UK meet a recognised safety standard. It requires graded companies to meet a range of vehicle safety measures and training processes. We want to see all

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<sup>11</sup> [https://s3.amazonaws.com/lcc\\_production\\_bucket/files/12399/original.pdf?1516807507](https://s3.amazonaws.com/lcc_production_bucket/files/12399/original.pdf?1516807507)

Government procurement to follow the TfL example of requiring FORS Silver Grade (or equivalent) rating for all contractors.

## **CLOCS**

The industry-led Construction Logistics and Community Safety (CLOCS) standard is designed to reduce work related road risk. More than 500 developers and fleet operators have signed up to the CLOCS standard and regularly audit their work sites to ensure that CLOCS standards are met.

Where adopted in London (Camden, City of London) the orderly arrival and departure of construction vehicles that are FORS graded is marshalled by people trained to do the job. We note that some contractors use phone apps to ensure that all vehicles are inspected before departure from depots and also use appropriate IT to monitor vehicle route and site arrivals.

LCC is currently seeking to assist all London boroughs in following the example of Camden and City in progressing to CLOCS champion status.

We would like to see the Government becoming a CLOCS champion and to specify CLOCS standards in its procurement.

## **Enforcement**

Vehicle standards must be enforced to be effective in reducing collisions. The London Freight Enforcement Partnership (LFEP) has successfully intervened to deter the most frequent and grievous offenders from running unsafe vehicles on London roads.

By 2017 LFEP had checked 33,000 vehicles, issued more than 9,000 FPNs and secured 12 licence revocations.

The LFEP work must be strengthened and replicated beyond London.

## **Pay per load**

Pay per load reward systems or bonuses for additional trips made by drivers can lead to excessive speeds and more aggressive driving. Clear regulations to restrict any payment system that encourages unsafe driving would help reduce casualties.

## **Consultation question 6**



*What can Government do to support better understanding and awareness of different types of road user in relation to cycle use in particular?*

Mutual consideration and respect for each other by road users is essential to a reduction in collisions and to enable a growing population to travel in comfort and safety. The Mayor of London has adopted 'Vision Zero' as his target with the aim of eliminating fatalities and serious injuries on the roads by 2041.

Like the Government's road safety policy, the London Mayor's programme follows the 'safe system' approach to reducing road danger that focuses on people, vehicles and infrastructure.

As the consultation notes, people's behaviour can vary regardless of what mode of transport they are using, but people on foot and on bicycles are more vulnerable than those in cars and HGVs. LCC has consistently argued that the greater the size of the vehicle the greater the responsibility of the driver or rider. This underpins some of the points made above.

### **Train the planners**

In the Netherlands mutual awareness of road users is shaped by the fact that most drivers also ride bicycles and most adult cyclists also drive cars. This also means that virtually all engineers, road planners and transport consultants are aware of designing for cyclists and pedestrian as well as motorist needs.

London has programme of training its engineers and planners in design for cycling. This helps to eliminate the potential for conflict at source in the design of traffic schemes. If Government want to double cycle use it needs to have a cadre of engineers and planners well-qualified to design the right infrastructure.

Similar training, to ensure a broad understanding of cycling issues and cycle design elements could, and should, be offered to ministers, regional councillors, mayors and others with a transport brief, or involvement in large transport and infrastructure schemes, ideally including experience of cycling in local conditions, and providing an understanding of the quality of schemes required to get a wider range of people cycling.

### **Exchanging places and awareness training**

Exchanging places, as quoted in the consultation, generally refers to getting cyclists or pedestrians in the cab of a lorry with poor direct vision. The counterpart is the Safer Urban Driving (SUD) module for lorry drivers.

Given that most cyclists do not drive lorries, some may not be aware of the severity of 'blind spots' in current lorry designs. To some extent, however, the issue has been publically highlighted by the deaths of cyclists in collisions with lorries.

LCC's messaging of cyclists provides additional information to the point that lorries are dangerous. Our leaflets highlight the specific front left corner danger area where the highest number of collisions occur and also identify the counter-intuitive 'bear right to turn left' movement that occurs with larger vehicles. These dangers can be reduced by making good 'direct vision' the standard (see above) for all urban lorries and by adopting 'Turning the Corner' legislation.

It should be noted that Exchanging Places, and other awareness training alone, is not a solution for this serious issue.

### **Safer Urban Driving**

In the UK, it is not unusual for lorry drivers to have little experience of urban cycling and this is corrected by the on-bike experience offered in the SUD module.

As noted above we would like to see SUD made part of the required CPC training for drivers. We note that there are cases of drivers repeating optional modules such as first aid rather than extending their learning to include SUD.

### **Close passing**

Close passing of cyclists by motor vehicles both endangers and intimidates. It likely discourages many from continuing cycling.

The West Midlands police initiative on close passing enforcement shows an effective way of alerting motorists to the hazards and impacts of close passing. And it appears to have had a dramatic effect on collisions since implementation.

We would like similar close passing initiatives to take place across the UK backed by Government messaging.

LCC will be initiating its own close passing messaging campaign shortly but the impact of voluntary organisation campaigns can be strengthened by police enforcement initiatives.

### **Dooring and 'Dutch reach'**

The tragic case of a cyclist dying as a consequence of injuries caused by a collision with an opened car door in Holloway Road highlights this common cause of injury.

The widespread use of tinted windows (a measure apparently approved by Government because it may reduce the use of air conditioning) has made it more difficult to observe whether there is a driver in a parked car who may open a door.

Drivers should be made aware of the hazard of opening their door without looking, and advised to reach for door handles with their left hand which would encourage them to look back for passing riders (this is called a 'Dutch reach').